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MEMO ENDORSED

October 18, 2022

BY ECF

Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: SEC v. StraightPath Venture Partners LLC et al., 22 Civ. 3897 (LAK)

Dear Judge Kaplan:

My firm represents the Individual Defendants Brian Martinsen, Francine Lanaia and Michael Castillero (collectively the “Individual Defendants”) in the referenced matter. We also currently represent Defendant Eric Lachow, but he is in the process of looking for separate counsel.

We are writing to request an adjournment of the hearing scheduled for 4:30 PM today on the Government’s Application to Intervene and For a Complete Stay (the “Motion to Stay”) [ECF. No. 101].

The Government seeks to halt discovery in this action. In relevant part, the Government expressed a concern that responses to document requests exchanged between the Parties are due on October 24, 2022.

The Plaintiff Securities and Exchange Commission and the Receiver have proposed, and the Defendants Messrs. Martinsen and Castillero and Ms. Lanaia are willing to agree to, a temporary postponement of the upcoming discovery deadlines in this case to allow the parties to fully brief the Motion to Stay.

Based on this agreement to temporarily stay discovery deadlines until the Motion to Stay can be briefed and ruled on, we respectfully request two weeks to file an opposition to the Motion to Stay.

Respectfully submitted,

/s/Scott N. Sherman

Scott N. Sherman and Josh Lewin